I am an FCC-licensed, amateur radio operator, currently holding Extra class license N2MG. I have been licensed since 1973 and consider amateur radio not only a worthwhile hobby, but a serious national (and global) resource. I am also an Electrical Engineer, a profession in which I have worked for over 25 years, a profession to which I was introduced by way of my involvement with amateur radio as a teenager. It is in this light I wish to express my concern over recent developments regarding BPL, in particular President Bush's recently expressed support and NRPM 04-37.

In several highly developed regions of the world (Europe, Japan), testing of BPL technologies has revealed just how damaging they are to existing users of the HF spectrum. The disruption witnessed during these tests led the several licensing authorities involved to decide to NOT allow BPL deployment in their jurisdictions. This fact should raise an eyebrow at the FCC, but it seems to be ignored. While I think we all agree that consumers can benefit from newer broadband technologies, but this should not be at the expense of the existing users of the HF frequency spectrum.

The HF spectrum is unique in that it allows long-range, even worldwide, communications with little or no infrastructure - no satellites, no networks, no repeaters. As such, it is a perfect environment for the individual experimenter such as the radio amateur. Its maximum usefulness, however, occurs when local electrical noise is kept to a minimum. The HF spectrum therefore deserves to be protected from incompatible technologies - BPL is just such a threat; one that renders large portions of the HF spectrum next-to-useless. Dedicated amateur radio operators strive to locate their stations far from urban areas (and their abundant electrical noise), thus creating an optimum environment for their experimentation and operating. One of BPL's primary targets seems to be the more rural areas - these very same areas into which radio amateurs tend to invest the most.

Some US companies, with a lot of money at stake, refute the evidence against BPL. They understate the threat, and seem to summarily cast aside the concerns of the amateur radio community, as if they (we) were simply a "nuisance". However, their motivations should be obvious, and their views subject to careful scrutiny. Amateur radio operators should not be ignored or otherwise treated as "pests" - they provide a necessary resource, one both misunderstood and under-valued in normal times. But when high-tech infrastructures, cell phones networks and satellite communications are disrupted, or otherwise incapable of operating, amateur radio operators step in. If the HF spectrum is rendered effectively (and permanently) useless to amateur radio operators in normal times (by the deployment of hostile technologies like BPL), the attraction of radio as a hobby will fade, the number of ready operators (for those

troubled times) will diminish, and the oft-used career path of teenage-ham-to-Engineer will vanish.

I therefore urge you to look carefully at the evidence and the potential permanent damage caused if BPL, as proposed, is deployed widely. Once the BPL animal is released, it will be difficult, if not impossible to contain it again. The harm it will cause is unconscionable.

Sincerely,

Michael F. Gilmer, N2MG
Vernon, NY